

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Bernard James

Case: 2:24-mj-30527

Judge: Unassigned,

Filed: 12-13-2024

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 13, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 922(g)(1)

Offense Description

Felon in possession of a firearm.

This criminal complaint is based on these facts:

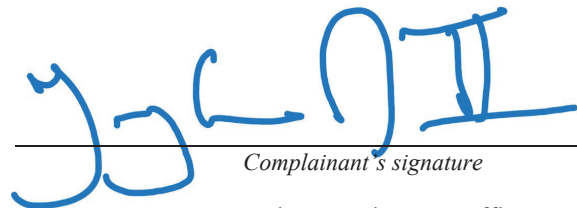
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: December 13, 2024

City and state: Detroit, Michigan

*Complainant's signature*Terry Cross-Nelson, Task Force Officer-ATF*Printed name and title**Judge's signature*Hon. Curtis Ivy, Jr. United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Task Force Officer/Detective Terry Cross-Nelson, being duly sworn,
depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Police Detective with the Detroit Police Department (DPD), having served since November 2002. I was promoted to the rank of Detective in August 2014 and am currently assigned to the Firearms Investigative Team (FIT), a specialized unit formed in collaboration with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), where I serve as a credentialed Task Force Officer. FIT represents a federal partnership focused on addressing firearm-related crimes.

2. With over 22 years of law enforcement experience and more than a decade as a Detective, I have specialized in firearm-related investigations throughout my career. This includes conducting over 400 firearm-related arrests and developing extensive expertise in offenses such as felon in possession of a firearm and illegal firearm trafficking. I hold two degrees, including a Master's degree from Cleary University, which, combined with my professional experience, has provided me with a comprehensive understanding of firearm offenses, investigative techniques, and the legal processes required to effectively address these crimes.

3. This affidavit is based on my personal knowledge, information obtained from witnesses interviewed by law enforcement, communications with other law enforcement officers, and my training and experience in firearm-related investigations. This affidavit is submitted for the limited purpose of establishing probable cause that Bernard GRIFFIN, also known as Bernard James (DOB: xx/xx/1988), has violated 18 U.S.C. § 922(g)(1) by being a felon in possession of a firearm. This affidavit does not contain all facts known to law enforcement regarding this investigation.

PROBABLE CAUSE

4. I reviewed a computerized criminal history, Michigan Third Circuit Court records, and federal NLETS data for GRIFFIN, which revealed the following felony arrests and convictions:

- a. On February 15, 2008, Griffin was charged with Felony Home Invasion 2nd Degree and Felony Larceny in a Building in Grand Traverse County, Michigan. He pleaded guilty and was sentenced to time served with probation.
- b. On May 18, 2012, GRIFFIN was charged in Wayne County, Michigan, with Felony Weapons Possession by a Felon and Felony Carrying a Concealed Weapon. These charges were dismissed following plea negotiations.

c. On November 2, 2017, GRIFFIN was arrested in Georgia for Felony Receipt, Possession, or Transport of a Firearm by a Convicted Felon. He was convicted and sentenced to imprisonment.

d. GRIFFIN has been convicted of multiple felony offenses, has served significant periods of incarceration, and was sentenced for a felony as recently as 2017. Therefore, there is probable cause to believe GRIFFIN is aware of his status as a convicted felon.

5. On November 13, 2024, at approximately 2:29 a.m., Detroit Police Officers responded to a ShotSpotter alert indicating gunfire at 1XXX8 Tacoma Street, Detroit, Michigan. Upon canvassing the location, officers discovered two bronzed 5.56mm spent shell casings approximately three feet from the back door of the residence. These casings were collected and tagged as evidence.

6. Subsequent investigation revealed that GRIFFIN resided at the address.

On November 25, 2024, I obtained a state search warrant for the residence at 1XXX8 Tacoma, which was executed on November 26, 2024, with the assistance of the Detroit Police Tactical Services Section (TSS) and FIT.

7. During the execution of the warrant, officers secured the residence and detained GRIFFIN. A search of the upstairs northwest bedroom resulted in the

recovery of a loaded GLFA GL-15 assault rifle-style pistol, chambered in .223 caliber, with three rounds of ammunition.

8. Proof of residency for GRIFFIN, along with additional firearm accessories, including a sling, were also recovered from the same location.

9. During a post-*Miranda* interview conducted by Task Force Officer Ali Bilal, GRIFFIN admitted the firearm would contain his DNA and acknowledged his status as a convicted felon, which prohibits him from possessing firearms.

10. On December 11, 2024, I contacted ATF Interstate Nexus Expert, Special Agent Kara Klupacs, and provided a verbal description of the GLFA GL-15 firearm and associated ammunition recovered by officers on November 26, 2024. Special Agent Klupacs confirmed that the firearm was shipped to Michigan from Alabama through Action Impact Gun Range which is located in the state of Michigan. Consequently, the firearm has traveled in and affected interstate commerce. Additionally, the ammunition was determined to have been manufactured outside of Michigan.

CONCLUSION

11. Based on the facts detailed above, there is probable cause to believe GRIFFIN knowingly and intentionally possessed a GLFA GL-15 firearm and associated ammunition, in violation of 18 U.S.C. § 922(g)(1). This violation

occurred on or about November 26, 2024, in the City of Detroit, County of Wayne,
in the Eastern Judicial District of Michigan.

Respectfully submitted,



Terry Cross-Nelson
Task Force Officer, ATF

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Curtis Ivy, Jr.
United States Magistrate Judge